

20 October 2018

Secretary of Transportation
United States Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590
Attn: Blane A. Workie, Assistant General Counsel for Aviation Enforcement Proceedings

Re: Submission in *NABR v. United Airlines et al.* Docket No. DOT-OST-2018-0124

Dear Madam Secretary:

We are submitting this letter to provide the Department of Transportation (DOT) with information that may be relevant to its evaluation of the above referenced complaint, which alleges that various airlines refuse to carry animals for critical biomedical research, but carry them for other purposes.

[Describe your organization and the relevance of biomedical research, including the treatments or diseases where you use live animal research and your concerns.]

Researchers must rely on live-animal research to safely develop treatments for both people and animals alike. Access to live-animal subjects is required in order to conduct this revelatory work. At the same time, current laws and regulations mandate this kind of research before life-saving medicines and treatments may be approved for use in humans.

According to the complaint, many airlines refuse to transport animals for these vital scientific discoveries, although the airlines will transport the same animals for non-research purposes, such as for zoos or as pets. We believe that as long as the government requires this research, it should also enforce its laws in a way that does not undermine these essential research requirements. This arbitrary delineation by the airlines - which we understand has no transportation related purpose - threatens the progress of key research, research which could reduce or even eradicate diseases.

We urge the DOT to investigate the complaint filed by NABR and to require all airlines to eliminate policies which discriminate against animal carriage and instead base carriage solely on the fact that the purpose of the transportation of animals is for legal, legitimate, necessary and essential life-saving biomedical research. We respectfully request that DOT take these actions to ensure the continued progress of essential medical research.

Sincerely,
Victoria Elam, CVT VTS (LAM)
Academy of Laboratory Animal Veterinary Technicians